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March 18, 2025

***Via ECF and E-MAIL:*** [Chambers of Judge Harvey Bartle@paed.uscourts.gov](mailto:Chambers_of_Judge_Harvey_Bartle@paed.uscourts.gov)

Honorable Harvey J. Bartle III, U.S.D.J.  
United States District Court for the  
Eastern District of Pennsylvania  
16614 U.S. Courthouse  
601 Market Street  
Philadelphia, Pennsylvania 19106



**Re: January 22, 2025 Order Regarding Pre-trial Motions and  
The Consolidated Motion to Dismiss under Fed. R. Civ. P. 12(b)(6)**

***Atlas Data Privacy Corporation, et al. v. Delvepoint LLC, et al.* bearing Civil Action  
No. 1:24-cv-04096-HB**

Dear Judge Bartle:

We represent defendant Delvepoint, LLC ("Delvepoint") in the Daniel's Law case in the United States District Court for the District of New Jersey assigned to your Honor captioned *Atlas Data Privacy Corporation, et al. v. Delvepoint LLC, et al.* bearing Civil Action No. 1:24-cv-04096-HB. We write pursuant to your January 22, 2025 Order calling for all pre-trial motions to be filed before March 18, 2025.

We write on behalf of Delvepoint to inform the Court that Delvepoint will join in the Defendants' Consolidated Motion to Dismiss under Fed. R. Civ. P. 12(b)(6) for failure to state a claim, which will be filed on March 18, 2025 in the matter captioned *Atlas Data Privacy Corp., et al. v. DM Group, et al.*, Civil Action No. 1:24-cv-04075-HB.

For the reasons set forth in the Consolidated Motion to Dismiss under Fed R. Civ. P. 12(b)(6) Delvepoint requests that the court grant the Motion and dismiss Plaintiff's Complaint with prejudice.

Respectfully submitted,

WADE CLARK MULCAHY LLP

*/s/ Robert J. Cosgrove*

Robert J. Cosgrove, Esq.

cc. Rajiv Parikh, Esq.